

## REMARKS

The Examiner has objected to the specification as having grammatical errors. The specification has been amended to correct the grammatical errors.

Claims 8, 21, and 45 have been cancelled. Claims 1, 17, 24, 32, 35, and 38 have been amended to clarify the subject matter regarded as the invention. Claims 1 – 5, 9 – 19, 22 – 42, and 46 – 53 are pending.

The Examiner has rejected claims 1 – 5, 9 – 19, 22 – 42, and 46 – 53 under 35 U.S.C. 103(a).

The rejection is respectfully traversed. The Office Action acknowledges that Perlman does not disclose “determining motion information coherence by dividing a magnitude of averaged motion vectors by an average magnitude of motion vectors,” as recited in claim 1. Office Action, p. 3. Horne discloses a common motion vector where the common motion vector may be the average motion vector (MVT/C) or the median motion vector (Col 12, line 65 – Col 13, line 4). The common motion vector described by Horne is a vector, whereas the coherence value as recited in claim 1 is a scalar value. See, e.g., Application at page 16, line 5 – page 17, line 2. To satisfy claim 1, one would have to determine the magnitude of an average motion vector such as described by Horne and divide that value by the average of the motion vector magnitudes (i.e., the denominator in some embodiments may be determined by determining the individual magnitudes and then averaging the magnitudes) to obtain a motion information coherence value. See, e.g., Application at page 16, line 5 – page 17, line 2. Horne does not describe performing these additional steps recited in claim 1. Moreover, neither Perlman nor Horne describes “determining motion information magnitude based at least in part on the average magnitude of motion vectors,” as recited in claim 1. Claim 1 is therefore believed to be allowable.

Claims 2 – 5, and 9 – 16 depend from claim 1 and are believed to be allowable for the same reasons described above.

Like claim 1, independent claims 17, 24, 32, 35, and 38 recite “determining motion information coherence by dividing a magnitude of averaged motion vectors by an average

magnitude of motion vectors” and “determining motion information magnitude based at least in part on the average magnitude of motion vectors.” As such, claims 17, 24, 32, 35, and 38 are believed to be allowable for the same reasons described above for claim 1.

Claims 18 – 19, and 22 – 23 depend from claim 17 and are believed to be allowable for the same reasons described above.

Claims 25 – 31 depend from claim 24 and are believed to be allowable for the same reasons described above.

Claims 33 – 34 depend from claim 32 and are believed to be allowable for the same reasons described above.

Claims 36 – 37 depend from claim 35 and are believed to be allowable for the same reasons described above.

Claims 39 – 42, and 46 – 53 depend from claim 38 and are believed to be allowable for the same reasons described above.

Reconsideration of the application and allowance of all claims are respectfully requested based on the preceding remarks. If at any time the Examiner believes that an interview would be helpful, please contact the undersigned.

Respectfully submitted,

Dated: 02/14/05

William J. James  
William J. James  
Registration No. 40,661  
V 408-973-2590  
F 408-973-2595

VAN PELT, YI & JAMES LLP  
10050 N. Foothill Blvd., Suite 200  
Cupertino, CA 95014